

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION

IRMA GARZA
Plaintiff,

Vs.

THE CITY OF EDINBURG, TEXAS
RICHARD MOLINA, DAVID TORRES,
JORGE SALINAS and GILBERT
ENRIQUEZ

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CIVIL ACTION NO. 7:18-CV-00267

PLAINTIFF IRMA GARZA'S SECOND CORRECTED/AMENDED MOTION TO
COMPEL DISCOVERY, REPLY TO DEFENDANTS' RESPONSE TO PLAINTIFF'S
CORRECTED MOTION TO COMPEL DISCOVERY AND FOR SANCTIONS

EXHIBIT A

E-mail sent to Defendants

David L Flores

From: David L Flores
Sent: Wednesday, May 8, 2019 9:50 AM
To: arnold aguilar
Subject: Irma Garza v. City of Edinburg

Arnold,

Hope all is well. As we discussed during the depositions taken on April 24, 2019, I am hopeful that we can resolve the pending discovery issues. In this regard, I will agree to limit my requests regarding the information requested below to the time period indicated for each item.

1. For each individual defendant, any and all phone numbers and the names of the phone service providers to any and all phones that they used from January 01, 2017 to the present.
2. For each individual defendant, phone records showing all incoming and outgoing calls and text messages between each defendant and Cary Zayas or Robin Zayas, for any and all phones that they used from January 01, 2017 to the date of Plaintiff's termination.
3. All payments made by any and all defendants (in any capacity) to Cary Zayas, Robin Zayas, and/or Z-Digital from January 01, 2016 to the present.

I have identified (956) 292-4923 as potentially belonging to Robin Zayas during the relevant time periods and (956) 363-3171 for Cary Zayas. Please be advised that my request is NOT limited to the phone numbers identified herein and are only being included to assist in facilitating production of the information requested. I do know for a certainty that at least Cary Zayas has had access to and utilized other phone numbers during this time period. Considering the nature of the relationship between Ms. Zayas and the individual defendants, it does not seem reasonable that they would not be able to readily identify the information requested.

The information requested is necessary before I can proceed with the depositions of the individual defendants. As our discovery deadline is fast approaching (5/21/19), it will be necessary to file a subsequent motion to extend the same. Please let me know if you agree to filing either a joint or agreed motion to extend.

Sincerely,

David L. Flores
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